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Class Counsel
(Additional counsel listed on the signature page)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

In re HONDA IDLE STOP
LITIGATION

This Document Relates to:
ALL ACTIONS

Master File No.: 2:22-cv-04252-MCS-SK

CONSOLIDATED ACTION

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: June 2, 2025
Courtroom: 7C
Time: 9:00 am

NOTICE OF MOTION AND MOTION

TO THIS COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on June 2, 2025, at 9:00 a.m., or as soon thereafter as the matter may be heard, in the United States District Court for the Central District of California, First Street Courthouse, located at 350 W. 1st Street, Courtroom 7C, before the Honorable Mark C. Scarsi, Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23 for an entry of order in the form prescribed in the proposed Preliminary Approval Order and setting the following schedule:

EVENT	DEADLINES
Commencement of Class Notice	On the date of entry of the Preliminary Approval Order.
Notice to be Substantially Completed	Sixty (60) days after the issuance of the Preliminary Approval Order
Plaintiffs' Motion, Memorandum of Law and Other Materials in Support of their Requested Award of Attorneys' Fees, Reimbursement of Expenses, and Request for Class Representatives' Service Awards to be Filed with the Court	No later than Sixty (60) days after issuance of the Preliminary Approval Order
Plaintiffs' Motion, Memoranda of Law, and Other Materials in Support of Final Approval to be Filed with the Court	No later than Sixty (60) days after the issuance of the Preliminary Approval Order
Deadline for Receipt by the Clerk of All Objections Filed and/or Mailed by Settlement Class Members	Ninety-five (95) days after the issuance of the Preliminary Approval Order
Deadline for filing Notice of Intent to Appear at Final Approval Hearing by Settlement Class Members and/or their Personal Attorneys	Ninety-five (95) days after the issuance of the Preliminary Approval Order
Deadline for Class Members to Submit their Request to Exclude Themselves (Opt-Out) to Settlement Administrator	Ninety-five (95) days after the issuance of the Preliminary Approval Order
Any Opposition by Defendant concerning Class Counsel's Fee and Expense Application, with accompanying expert report(s) and any Rule 702 motion(s)	Ninety-five (95) days after the issuance of the Preliminary Approval Order

Any submission by the Parties concerning Final Approval of Settlement and Responses to any objections and requests for exclusion	One Hundred and Nine (109) days after the issuance of the Preliminary Approval Order
Class Counsel's Reply In Support of Fee and Expense Application	One Hundred and Nine (109) days after the issuance of the Preliminary Approval Order
Settlement Notice Administrator Shall File the Results of the Dissemination of the Notice with the Court and list of Opt-Outs	Seven (7) days before the Fairness Hearing
Final Approval Hearing	_____ at 1:30 p.m. - No sooner than One Hundred Twenty-One (123) days after Preliminary Approval Order

This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the accompanying Joint Declaration of Class Counsel, the Settlement Agreement and the exhibits thereto, and the pleadings filed in the Action.

DATED: May 12, 2025

By: /s/ H. Clay Barnett, III

H. Clay Barnett III (*pro hac vice*)
W. Daniel "Dee" Miles III (*pro hac vice*)
Demet Basar (*pro hac vice*)
J. Mitch Williams (*pro hac vice*)
Rebecca D. Gilliland (*pro hac vice*)
Dylan T. Martin (*pro hac vice*)
Trent H. Mann (*pro hac vice*)
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17 ***Class Counsel***
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Certificate of Service

I hereby certify that on May 12, 2025, I electronically filed the foregoing document using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/ H. Clay Barnett, III

H. Clay Barnett, III (*pro hac vice*)

Signature of Certification

Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: May 12, 2025

/s/ H. Clay Barnett, III

H. Clay Barnett, III

**BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C**